

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

WERNER ENTERPRISES, INC.,

Defendant;

and

ANDREW DEUSCHLE,

Plaintiff Intervenor,

v.

WERNER ENTERPRISES, INC.,

Defendant.

CASE NO: 8:18-CV-329

**JOINT STIPULATION REGARDING
PROGRESSION ORDER DEADLINES**

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

DRIVERS MANAGEMENT, LLC and
WERNER ENTERPRISES, INC.,

Defendants.

CASE NO: 8:18-CV-462

**JOINT STIPULATION REGARDING
PROGRESSION ORDER DEADLINES**

COME NOW the parties in the above-captioned cases, and pursuant to the Court's Text Minute Entry (Filing 44 in 8:18-CV-329-JMG-SMB; Filing 27 in 8:18-CV-462-JMG-SMB), submit the following amended deadlines regarding expert disclosures, expert discovery, and motion practice, which the parties propose to use in these consolidated cases in place of the expert disclosure, expert discovery, and expert motion practice

deadlines set forth in the parties' Rule 26(f) report (Filing 20 in 8:18-CV-462-JMG-SMB) filed on February 8, 2019:

Plaintiff and Intervenor's Expert Designations and Reports: August 9, 2019;

Defendants' Expert Designations and Reports: September 20, 2019;

Plaintiff and Intervenor's Reply Reports: November 1, 2019;

Deadline to complete Expert Depositions: November 22, 2019;

Deadline to file Daubert Motions: January 10, 2020.

WHEREFORE, the parties respectfully request the Court adopt the deadlines set forth above.

Dated this 21st day of March, 2019.

DRIVERS MANAGEMENT, LLC and
WERNER ENTERPRISES, INC., Defendants

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION, Plaintiff

/s/ Brandon J. Crainer

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ANDREW DEUSCHLE, Intervenor Plaintiff

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